

The Hon. Tana Lin
The Hon. John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

MARQUISE TOLBERT and
KISEAN KOLEMAN,
Defendants.

NO. CR23-104TL

NOTICE OF RELATED CASE

UNITED STATES OF AMERICA,
Plaintiff

v.

PARCHEY KELLY
Defendant.

NO. CR23-105TL

NOTICE OF RELATED CASE

1 UNITED STATES OF AMERICA,
2 Plaintiff

NO. CR23-118TL

NOTICE OF RELATED CASE

3
4 v.

5 1. FRANK LOZANO GRAVES,
6 2. FRANK MARQUIS GRAVES,
7 3. LOREN MICHAEL FITZGERALD,
8 4. MARQUISE LATRELLE TOLBERT, and
9 5. ADRIANNA KINSEY,
10 Defendants.

11
12 UNITED STATES OF AMERICA,
13 Plaintiff

NO. CR23-125JCC

NOTICE OF RELATED CASE

14
15 v.

16 CHRISOVEN BRANDT,
17 Defendant.

18
19 **BACKGROUND**

20 On June 28, 2023, Marquise Tolbert and Kissean Coleman were indicted under
21 CR23-104. On the same day, Parchey Kelley was indicted under CR23-150RSM. The
22 government filed a notice of related cases and the Kelley case was reassigned to Judge
23 Lin.

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27 Notice of Related Case - 2

United States v. Tolbert et al., CR23-104TL

United States v. Kelly, CR23-105TL

United States v. Graves et al., CR23-118TL

United States v. Brandt, CR23-125JCC.

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On July 19, 2023, Frank Lozano Graves (Graves Sr.), Frank Marquise Graves (Graves Jr.), Loren Fitzgerald, Marquise Tolbert, and Adrianna Kinsey were indicted under cause number CR23-118TL.

On August 8, 2023, Chrissoven Brandt was indicted under cause number CR23-125JCC.

These cases all arise from a Federal Bureau of Investigation (FBI) investigation into drug and firearm trafficking. During this investigation, Graves Sr.'s phone, Graves Jr.'s phone and Tolbert's phone were all subject to Court authorized wire interception.

Investigators focused on Brandt after he engaged in an intercepted text exchange with Tolbert in which they discussed selling controlled substances, including methamphetamine, cocaine, and fentanyl. A subsequent search of Brandt's residence agents recovered fentanyl pills and a loaded handgun.

DISCUSSION

Local Criminal Rule 13 encourages counsel "to file a notice of related case in order to bring such cases to the Court's attention." The Court may reassign criminal cases pursuant to Local Criminal Rule 13 which provides:

- (a) **Common Questions.** When criminal cases involving common questions of law and fact (but not necessarily the same parties) are assigned to different judges, there may be good reason to assign all of said cases to one judge. Such may be assigned to the judge to whom the case bearing the earliest filing number was assigned, at his or her option.

The United States submits this notice to inform the Court that the cases set forth above are related. All four matters originated out of the same wire interceptions and involve either firearm or drug trafficking.

CONCLUSION

For the reasons stated above, the government submits this notice advising the Court that these all of these cases are related such that reassignment to the same judge

1 may be in the interest of judicial economy. The government specifically requests that
2 *United States v. Chrissoven Brandt*, CR23-125JCC, be reassigned to Judge Lin, bringing
3 all four matters before the same judge. The government is not requesting or that these
4 cases be joined for trial.

5
6 DATED this 18th day of August, 2023.

7
8 Respectfully submitted,

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10 Acting United States Attorney

11 s/ Stephen Hobbs

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